POMERANTZ LLP

WOLF POPPER LLP

600 Third Avenue New York, NY 10016 845 Third Avenue New York, NY 10022

October 7, 2022

Via ECF

Hon. Andrew M. Edison United States Magistrate Judge United States District Court Southern District of Texas 601 Rosenberg, Seventh Floor Galveston, TX 77550

Re: Edwards v. McDermott Int'l, et al., Case No. 4:18-cv-4330

Dear Judge Edison,

The parties propose the following topics as an agenda for the upcoming conference on Tuesday,

October 11 at 8:00 a.m.:

- 1. Discussion of the Court's requested withdrawal / refiling of class certification motions
- 2. Case schedule, including class certification
- 3. Timing and scope of discovery related to SEC investigation
- 4. Effect of motion to dismiss ruling on scope of discovery related to the expanded alleged class period
- 5. Effect of motion to dismiss ruling on non-party subpoenas previously served by Plaintiffs concerning discovery related to the expanded alleged class period

Please let us know if you need any further information.

Respectfully submitted,

/s/ Matthew Tuccillo Lead Counsel for the \$10(b) Lead Plaintiff /s/ Matthew Insley-Pruitt Lead Counsel for the \$14(a) Lead Plaintiff

Cc: Defense counsel